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Attorney For Debtor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>IN RE:</b>	§	<b>CASE NO. 14-44789-13</b>
	§	
<b>Albert O. Shields, Sr.,</b>	§	
<b>xxx-xx-3658</b>	§	
	§	<b>Hearing Date: August 14, 2015</b>
	§	<b>Hearing Time: 8:30 a.m.</b>
	§	
<b>5451 N Hwy 144</b>	§	
<b>Granbury, TX 76048</b>	§	
	§	
<b>Debtor(s)</b>	§	

**DEBTOR'S MOTION TO MODIFY CHAPTER 13 PLAN AFTER CONFIRMATION**  
**DATE OF MODIFICATION:**  
**July 20, 2015**

Pursuant to 11 U.S.C. §1329 the Debtor requests the following modification(s) to the Debtor's original or last modified Chapter 13 plan.

**HISTORY OF CASE**

<b>Petition Date:</b>	<b>12/1/2014</b>
<b>First Meeting Date:</b>	<b>2/11/2015</b>
<b>Confirmation Date:</b>	<b>4/3/3015</b>
<b>Total Paid in to Date:</b>	<b><u>\$1,750.00</u></b>
<b>Amount Due to be Current:</b>	<b><u>\$0.00</u></b>
<b>Plan Base (Current):</b>	<b><u>\$23,160</u></b>

**MODIFICATION(S) OF DEBTOR'S(S) PAYMENTS TO TRUSTEE**

Change monthly payment amount from:

\$250 x 5  
\$420 x 48

TO:

\$250 x 12  
\$906 x 48

Debtor's new payment start date may not be more than 30 days from above date.

The above changes(s) will result in a new "BASE AMOUNT" (total payments due to the Trustee under the Plan, if all payments are timely made) of \$46488 AND

Plan payments to the Trustee as listed above will resume on or before July 22, 2015. *The Chapter 13 Trustee must lower the Wage Order Instantly if modification calls for a reduction in payment.*

**MODIFICATION OF PAYMENTS TO CREDITOR(S)**

**ADD:**

NAME:	COLLATERAL	CLASS:	AMOUNT:	VALUE:	%
TREATMENT GREENTREE	House and Lot Secured		\$10,276.66	\$400,000	

POST PETITION ARREARS PER AGREED ORDER

TO MAKE PLAN PER TRCC SUFFICIENT

The automatic stay shall be lifted and the Trustee shall cease disbursement on account of any surrender of collateral as indicated above, without further order of the court as of the date of filing hereof, pursuant to General Order 2006-01, paragraph 4e. The automatic stay shall be lifted and the Trustee shall cease disbursement on account of any surrender of collateral as indicated above, without further order of the court as of the date of filing hereof, pursuant to General Order 2006-01, paragraph 4e.

**DEBTOR'S(S) ATTORNEY FEES**

Total amount of \$400.00, of which ***\$Paid through Plan.*** will be paid through the plan by the Trustee pro rata, after payment of specified monthly payments and before any other pro rata payments.

**REASON(S) FOR MODIFICATION:**

xxxx To cure plan arrears to the Trustee (if any)

\_\_\_\_\_ To replace an Interlocutory Order that was previously entered (if any)

xxxx To Provide or modify treatment for Secured, Priority or Unsecured claim not previously provided for: ADD POST PETITION ARREARS PER AGREE ORDER

XXXX ***To make plan sufficient PER TRCC***

To make plan sufficient (based on allowed claims).

To modify the unsecured creditors pool to reduce the amount of the creditor pool to the amount already dispersed.

To modify percentage to Unsecured Creditors in a pre-10-17-05 case from \_\_\_\_\_% to \_\_\_\_\_%.

Other:

All other provisions as set forth in the last confirmed plan remain the same.

DATED this the 20th day of ***July***, 20***15***.

Respectfully submitted,

**Bailey & Galyen**

Attorneys at Law

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ATTORNEY FOR DEBTOR

By /s/***Leticia M. Evans***

Leticia M. Evans

Bar #24012601

Email: levans@galyen.com

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certifies that a copy of the foregoing was served, on or within one business date of the filing of this document, by first class mail, postage per-paid on the most recent mailing matrix maintained by the Court as of the date of this document was filed with the court, as well as the debtor(s) in this case. This document was sent via electronic transfer by the Clerk's office to:

Timothy Truman  
Chapter 13 Trustee  
6851 NE Loop 820, Suite 300  
N. Richland Hills, TX 76180

Office of the United States Trustee  
1100 Commerce Street, Room 976  
Dallas, Texas 75242

By /s/Leticia M. Evans  
Leticia M. Evans